

**JENNIFER MOUZIS
MOUZIS CRIMINAL DEFENSE**

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Attorney for Defendant
JUAN VALENTIN MANRIQUEZ

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	2:21-cr-00213-DAD-1
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE JUDGMENT AND
v.)	SENTENCING
)	
JUAN MANRIQUEZ,)	
)	
Defendant.)	
_____)	

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Justin Lee and Defendant Juan Manriquez, by and through his counsel, Jennifer Mouzis agree and stipulate to vacate the date set for judgment and sentencing, February 21, 2023 at 9:30 a.m., in the above-captioned matter, and to continue the judgment and sentencing to May 16, 2023 at 9:30 a.m. in the courtroom of the Honorable Dale A. Drozd. Federal Probation Officer, Miranda Lewis, also agrees to this change.

In addition, the parties stipulate to the following modification to the schedule of disclosure relating to the pre-sentence report ("PSR"):

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Proposed Pre-Sentence Report April 04, 2023

Written objections to the PSR April 18, 2023

Final PSR April 25, 2023

Formal objections to PSR May 2, 2023

Reply, or Statement of Non-Opposition May 9, 2023

The reason for the continuance is that defense and probation have not been able to meet with Mr. Manriquez for his interview with probation. The delay is due to Mr. Manriquez's transfer to Butte County jail, conflicting holiday schedules, and terrible weather conditions.

Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

IT IS SO STIPULATED.

Dated: January 20, 2023

PHILLIP A. TALBERT
United States Attorney

By: /s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney

Dated: January 20, 2023

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
JUAN VALENTIN MANRIQUEZ

ORDER

For the reasons set forth in the accompanying stipulation, the judgment and sentencing date of February 21, 2023, at 9:30 a.m. is VACATED and the above-captioned matter is set for judgment and sentencing on May 16, 2023, at 9:30 a.m.

It is FURTHER ORDERED that the schedule of disclosure be modified as follows:

Proposed Pre-Sentence Report April 04, 2023

Written objections to the PSR April 18, 2023

Final PSR April 25, 2023

Formal objections to PSR May 2, 2023

Reply, or Statement of Non-Opposition May 9, 2023

IT IS SO ORDERED.

Dated: January 22, 2023


UNITED STATES DISTRICT JUDGE